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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 ALICIA VANDERWOUDE,

11 Plaintiff,

12 vs.

13 SAFEWAY, INC., a Delaware Corporation,

14 Defendant.
15

No. 2:21-cv-626

NOTICE OF REMOVAL TO
FEDERAL COURT

16 Please take notice that Defendant Safeway Inc. hereby removes to the United
17 States District Court for the Western District of Washington the action described below.

18 On December 16, 2020, Defendant Safeway Inc. was served with a summons
19 (**Attachment 1**) and complaint (**Attachment 2**) in an action entitled *Alicia Vanderwoude*
20 *v. Safeway, Inc. et al.*, King County Superior Court No. 20-2-17270-7. The first date
21 upon which Safeway Inc. received a copy of this complaint was December 16, 2020.

22 The complaint does not specify the amount of damages being claimed by the
23 Plaintiff. On December 31, 2020, Safeway propounded a request for a statement of
24 damages which asked Plaintiff to disclose the damages Plaintiff is claiming in this matter.
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NOTICE OF REMOVAL TO
FEDERAL COURT - 1

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Turner Kugler Law, PLLC

6523 California Ave SW #454
Seattle, WA 98136
(206) 659-0679

1 On May 3, 2021, in response to this request, Plaintiff notified Safeway that Plaintiff is
2 claiming damages in excess of \$75,000.

3 There is complete diversity because the Plaintiff is a citizen of the State of
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws to the
5 State of Delaware with its principle place of business in the State of California.

6 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)
7 because it is between citizens of different states and the amount in controversy exceeds
8 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.
9 §1441 based on diversity jurisdiction.

10 Safeway filed a jury demand in state court (**Attachment 3**).

11 **INTRADISTRICT ASSIGNMENT**

12 The case is currently pending in Skagit County so LCR 3(e) indicates it will be
13 initially assigned to a Seattle Judge.

14 A civil case cover sheet is attached as **Attachment 4**.

15 Dated: May 11, 2021.

16 TURNER KUGLER LAW, PLLC

17 By: s/ John T. Kugler
18 John T. Kugler, WSBA # 19960
19 Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff:

Joseph D. Bowen
Attorney at Law
401 S. Second St.
Mount Vernon, WA 98273
jdb@bowenfirm.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

s/ John T. Kugler

JOHN T. KUGLER, WSB #19960
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